

**Commonwealth of Kentucky  
Division for Air Quality**

***RESPONSE TO COMMENTS***

ON THE CONDITIONAL MAJOR DRAFT PERMIT F-07-021

Conditional Major / Synthetic Minor, Operating

Goodrich Corporation

Calvert City, KY 42029

May 15, 2007

Carolina Alonso, Reviewer

SOURCE ID: 21-157-00004

SOURCE A.I. #: 2919

ACTIVITY ID: APE20070001

*Comments on Goodrich Corporation Draft FESOP Air Quality Permit submitted by Kevin P. Sheridan, HSE Manager for Westlake Vinyls, Inc (Westlake).*

**General Comment:**

The Permit Statement of Basis, Permit Application Summary Form, and the Draft Permit contain numerous references to Westlake Vinyls, Inc. receiving vent streams from Goodrich Corporation for treatment in either the Primary Incinerator (Westlake EPN 530) or the Oxy Incinerator (Westlake EPN 453). Currently, Goodrich sends the vent streams from Goodrich's C Stripper and Superfund site soil vapor extraction ("SVE") system to Westlake's incinerator pursuant to a long term (10 year) contractual agreement that expires on August 17, 2007. From August 17, 2007 forward, Westlake has no obligation, contractual or otherwise, to process Goodrich's vents in Westlake's incinerators. Because the duration of the proposed Goodrich Corporation Permit extends several years beyond Westlake's obligations to provide incineration services to Goodrich, Westlake respectfully requests all references to Westlake or Westlake Equipment (i.e. Primary and/or Oxy Incinerators) be removed from the permit and supporting documents. Specific revisions concerning this issue will be identified below in the respective sections.

**Permit Statement of Basis**

Comment No. 1: The "Source Description" that describes the remediation responsibilities of the Goodrich Corporation at the Calvert City site is incomplete. The Superfund remediation activities encompass only a portion of the site that lies to the east of the Westlake Vinyls, Inc. facility. The RCRA remediation activities (most of which occur west of the Superfund site in and around the process areas) are described in the draft permit, but are not captured in the first paragraph of the "Source Description" accurately. The last sentence of the first paragraph should be revised to read as follows "*Goodrich Corporation is responsible for the Superfund and RCRA remediation activities as well as the associated emissions.*"

*Division's response: The Division considers that the Statement of Basis is clear enough with respect to the source description. A description of RCRA remediation activities is provided in the second paragraph. There are no changes to the statement of basis as a result of this comment.*

Comment No. 2: In the third paragraph, please remove the following for the reasons contained in the "General Comment" above: "*Alternate controls for the vent organics are Westlake Vinyls Inc. (Westlake) Oxy and Primary Incinerators (Westlake's emission points 453 and 530). The system will also treat organic vapors from a vapor extraction system at the Superfund site.*"

*Division's response: Goodrich is required to demonstrate compliance with operating and emission*

*limitations in the permit. An alternative is for emissions to be vented to Westlake's Incinerators. If, for any reason, the agreement between Goodrich and Westlake regarding the incinerators is terminated, then Goodrich will have to apply to the Division in order to either replace these control devices or use the carbon bed adsorption units. There are no changes to the statement of basis as a result of this comment.*

Comment No. 3: In the fifth paragraph in the "Source Description" section, it is discussed that the AS/SVE system is "*planned (under negotiation) to be vented to Westlake's Primary Incinerator (Westlake's emission point 530).*" Westlake is not presently engaged in any negotiations with regards to treating the AS/SVE off-gases on behalf of Goodrich Corporation. Negotiations conducted greater than two (2) years ago were not successful and there have been no recent contacts by Goodrich regarding the proposed arrangement. As discussed in the "General Comment" above, the current contract to operate the "C Stripper" unit expires on August 17, 2007. Westlake requests all references to Westlake's Primary Incinerator to be deleted.

*Division's response: See response to Comment No. 2.*

Comment No. 4: For the reasons as discussed in the "General Comment" above, Westlake requests deletion of the "Comments:" section, with the exception of the "*Non Applicable regulations*" section.

*Division's response: See response to Comment No. 2.*

### **Permit Application Summary Form**

Comment No. 5: In the "Emission Summary" table, the actual emissions for HAPs as stated in the table appear incomplete or improperly rounded to the nearest ton. The HAP emissions cannot be truly zero (0) tons per year knowing that components leak gaseous compounds at some small rate regardless of the "relative tightness" of the packing, seal, or gasket. In addition, several sources of a fugitive nature associated with Goodrich's Superfund and RCRA remediation activities or historical releases have not been accounted for by Goodrich in its permit application. These sources include the surface impoundments known as Ponds 2 and 1A, the atmospheric vents atop the closure cell, and diffusion of contaminants from soil into the atmosphere as a consequence of historical releases to the environment by Goodrich.

*Division's response: Actual Emissions have been taken from the Division's Emission Inventory System and are rounded to the nearest ton in the summary. There are no changes to the permit application summary form as a result of this comment.*

Comment No. 6: In the second paragraph of the "SOURCE DESCRIPTION:" please remove the last sentence which states: "*The AS/SVE is planned (under negotiation) to be vented to Westlake's Primary Incinerator (Westlake's emission point 530).*"

*Division's response: See response to Comment No. 2.*

**Draft Permit**

Comment No. 7: For the reasons specified in the “General Comment” above, Westlake requests the removal of all verbiage pertaining to the use of Westlake’s equipment to treat vent streams struck from the revised attached draft permit.

*Division’s response: See response to Comment No. 2.*

Comment No. 8: Emission point 048, Groundwater Stripping System, does not have any parametric monitoring and/or recordkeeping requirements that assure the groundwater is being treated properly.

401 KAR 63:020 requires that the “Persons responsible for a source from which hazardous matter or toxic substances may be emitted shall provide the utmost care and consideration, in the handling of these materials...” At a nominal groundwater influent concentration of 100 ppm of 1,2-dichloroethane) and a flow rate of 1000 gpm to C Stripper, this stream could result in uncontrolled emissions of 438,000 lbs/year of 1,2-dichloroethane. This single HAP is used as an example. The groundwater also contains numerous other chlorinated volatile and semi-volatile organic compounds as well as other non-chlorinated volatile (benzene) and semi-volatile (naphthalene) organic compounds that would add to the uncontrolled HAP/VOC potential. Either a performance test or other engineering calculations should be performed to develop parametric ranges (for steam loading and overhead temperature) that support removal of contaminants to less than 4.5 ppm (this is the level at which 1,2-dichloroethane residual in treated groundwater is less than 10 tons/yr at 1,000 gpm). Some assurance that the potential uncontrolled emissions of HAPs/VOCs are less than the major source threshold of 10 tons of a single HAP and/or 25 tons of combined HAPs and/or 100 tons of VOCs is warranted.

*Division’s response: Operating limitation 1.b. reads:*

*“Emissions from the groundwater stripping system shall be vented through a carbon bed adsorption or to one of the Westlake’s incinerators (EP 453 or EP 530) at all times. [To preclude applicability of 401 KAR 52:020, Title V Permits]”*

*This condition and its Compliance Demonstration Method ensure that HAPs and VOC emissions do not exceed major source thresholds so Goodrich can keep its conditional major status. There are no changes to the permit as a result of this comment.*